

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No: 20-cr-113 DSD/BRT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	MOTION TO TEMPORARILY
)	RELEASE DEFENDANT'S
v.)	PASSPORT THEN RETURN TO
)	PROBATION
Mena D Yousif (2),)	
)	
Defendant,)	

TO: THIS HONORABLE COURT AND THE UNITED STATES OF AMERICA AND ITS ATTORNEY, MELINDA WILLIAMS, ASSISTANT UNITED STATES ATTORNEY.

BACKGROUND

The Defendant is currently under indictment for aiding an offender after the fact. She was arrested in Mexico and extradited to Minnesota. She is currently on house arrest and is supervised by Bradly Ruprecht, United States Probation Officer.

When the Defendant was arrested in Mexico the Mexican authorities took custody of her infant son. The child has remained in Mexico since the Defendant's arrest many months ago. The Defendant's parents are currently in Mexico to retrieve the child and must present the Defendant's original passport to prove that the mother of the child is a U.S. Citizen. The plan to bring back the child would include a temporary release of the Defendant's passport, send it to the parents in Mexico Fed Ex, and upon their return, deliver the passport back to probation all the while the defendant remains at home on house arrest.

Defense counsel has spoken to AUSA Williams, and US Probation officer Ruprecht, and neither objects to this request.

MOTION

1. The Defense hereby moves this honorable court to Order the release of the Defendant's passport temporarily for the sole purpose of proving citizenship of the Defendant so that her parents may retrieve the child currently in the custody of the Mexican Authorities. Upon completion of said task the passport will be returned to probation.

RIVERS LAW FIRM, P.A.

Date 6-28-2021

By 
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